

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

STEVEN E. GORRELL, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

WAKE COUNTY,

Defendant.

CA No. 5:21-CV-00129

PLAINTIFF'S MOTION FOR APPROVAL OF ATTORNEYS' FEES AND COSTS

Plaintiff Steven E. Gorrell ("Plaintiff"), on behalf of himself and all others similarly situated, through his undersigned counsel, hereby moves this Court, pursuant to Rule 54(d) of the Federal Rules of Civil Procedure and 29 U.S.C. § 216(b), for an order approving attorneys' fees of \$113,881.00 for successfully obtaining a fair, just, and reasonable resolution of Plaintiffs' Fair Labor Standards Act ("FLSA") claim, as outlined in the parties' contemporaneous Joint Motion to Approve Settlement Agreement, and reasonable costs of \$7,487.85 advanced in the prosecution of this case. In support of this Motion, Plaintiff shall rely upon the accompanying Memorandum of Law and the Exhibits attached thereto.

WHEREFORE, Plaintiff prays that the Court enter an order granting this Motion for Approval of Attorneys' Fees and awarding Plaintiff's requested appropriate attorneys' fees and costs.

Respectfully submitted this January 7th, 2022.

OXENDINE BARNES & ASSOCIATES PLLC

By: /s/ Ryan D. Oxendine
Ryan D. Oxendine (NC State Bar # 27595)
James A. Barnes IV (NC State Bar # 33356)
Spencer S. Fritts (NC State Bar # 53759)
6500 Creedmoor Rd., Suite 100
Raleigh, NC 27613
Telephone: 919-848-4333
Fax: 919-848-4707
ryan@oxendinebarnes.com
jim@oxendinebarnes.com
spencer@oxendinebarnes.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on this day, I filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record for the parties:

Kevin S. Joyner
Michael B. Cohen
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
8529 Six Forks Road, Suite 600
Raleigh, NC 27615
Telephone: (919) 787-9700
Fax: (919) 783-9412
Kevin.joyner@ogletree.com
Michael.cohen@ogletree.com

Roger A. Askew
Jennifer Jones
Wake County Government
County Attorney's Office
P.O. Box 550
Raleigh, NC 27602
Telephone: (919) 856-5500
Fax: (919) 856-5504
Roger.askew@wakegov.com
Jennifer.jones@wakegov.com
Attorneys for Defendant Wake County

Respectfully submitted,

OXENDINE BARNES & ASSOCIATES PLLC

By: /s/ Ryan D. Oxendine
Ryan D. Oxendine (NC State Bar # 27595)
James A. Barnes IV (NC State Bar # 33356)
Spencer S. Fritts (NC State Bar # 53759)
6500 Creedmoor Rd., Suite 100
Raleigh, NC 27613
Telephone: 919-848-4333
Fax: 919-848-4707
ryan@oxendinebarnes.com
jim@oxendinebarnes.com
spencer@oxendinebarnes.com
Attorneys for Plaintiffs